

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

ELMER CAMPBELL, et al.,	:	Case No. C-1-01-527
	:	J. Beckwith; Mag J. Hogan
Plaintiffs,	:	
	:	
v.	:	AFFIDAVIT OF
	:	<u>GEORGE M. REUL, JR.</u>
INTERNATIONAL PAPER,	:	
SUN CAPITAL PARTNERS, INC.	:	
SMART PAPERS	:	
	:	
Defendants.	:	

State of Ohio)
) SS
County of Hamilton)

I, George M. Reul, Jr., first being duly sworn and under oath hereby state based on personal knowledge as follows:

1. I am an attorney, who along with Randolph H. Freking, Mark Napier and the law firm Freking & Betz, represent the Plaintiffs in this action.

2. Attached to this Affidavit as Exhibit A is a true and accurate copy of information that Plaintiffs' counsel downloaded from Defendant Sun Capital's web site at www.suncappart.com.

3. Attached to this Affidavit as Exhibit B is a true and accurate copy of an article that Plaintiffs' counsel downloaded from Sun Capital's web site.

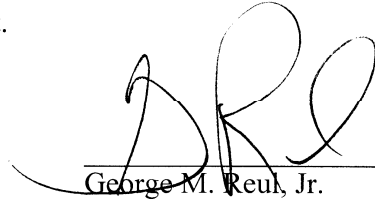
4. Attached to this Affidavit as Exhibit C is a true and accurate copy of a letter dated January 8, 2001 from Clarence "Bud" Terry to IP employees that was produced by Plaintiffs to Defendants during discovery.

5. Attached to this Affidavit as Exhibit D are true and accurate copies of letters dated February 9, 2001 from Clarence "Bud" Terry to IP employees that were produced by Plaintiffs to Defendants during discovery.


6. Attached to this Affidavit as Exhibit E are true and accurate copies of advertisements for Smart Papers seeking to hire for production positions that were run in The Cincinnati Enquirer and Hamilton Journal News on February 11, 2001.

7. Attached to this Affidavit as Exhibit F is a true and accurate copy of an article Plaintiffs' counsel downloaded from Sun Capital's web site.

Further Affiant Sayeth Naught.


George M. Reul, Jr.

Sworn to and subscribed before me on this 31st day of October, 2003.


Notary Public



JENNA WHITE
Notary Public, State of Ohio
My Commission Expires
November 1, 2006